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**UNITED STATES DISTRICT COURT
 IN AND FOR THE DISTRICT OF NEVADA**

| | | |
|---------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No.: 2:24-mj-0677-DJA |
| v. |) | |
| |) | STIPULATION TO CLOSE CASE |
| PEDRO HERNANDEZ-PEREZ, |) | |
| |) | |
| Defendant. |) | |
| |) | |
| _____ |) | |

IT IS STIPULATED AND AGREED, by and between SIGAL CHATTAH, United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the United States of America, and Frank Coumou, Esquire, and Tanner Harris, Esquire counsels for defendant Pedro Hernandez-Perez, that the above-captioned matter be closed.

This Stipulation is entered into based upon the following:

- On or about January 29, 2025, defendant entered into a Petty Offense Agreement with the United States in which he agreed to plead guilty to Count One of the Complaint, Operating a Motor Vehicle while Under the Influence of Alcohol, in violation of 36 C.F.R. § 4.23(a)(1) *See* ECF No. 12.

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2 1. As such, the parties jointly request that the defendant be allowed to withdraw
3 his guilty plea to count one and the government moves to amend count one to reckless
4 driving. The parties also jointly request that the above-captioned matter be closed.
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7 DATED this 24th day of July, 2025.
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9 Respectfully submitted,

10 SIGAL CHATTAH
11 United States Attorney
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13 /s/ Frank Coumou
14 FRANK COUMO, ESQ.
15 TANNER HARRIS, ESQ.
16 Attorneys for Defendant
17 **PEDRO HERNANDEZ-PEREZ**
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/s/ Skyler Pearson
SKYLER PEARSON
Assistant United States Attorney

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7 **UNITED STATES DISTRICT COURT**
8 **IN AND FOR THE DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,)

10 Plaintiff,)

11 vs.)

12 PEDRO HERNANDEZ-PEREZ,)

13 Defendant.)
14)
15)

Case No.: 2:24-mj-0677-DJA

ORDER TO CLOSE THE CASE

16 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
17 Court finds that:

18 1. Defendant Pedro Hernandez-Perez has successfully completed the conditions
19 of his sentencing.

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ORDER

IT IS HEREBY ORDERED that the defendant is allowed to withdraw his guilty plea to count one and that the count one be amended to reckless driving.

IT IS HEREBY ORDERED that the parties move the Court in the above-captioned matter case be closed, as all requirements have been completed.

DATED this 24th day of July, 2025


UNITED STATES MAGISTRATE JUDGE